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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH; *et al.*

Plaintiffs,

vs.

RYAN CARROLL; *et al.*

Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**PLAINTIFFS' LIST OF  
DEFENDANTS' UNIDENTIFIED  
ASSETS**

Presiding Judge: Hon. Wesley L. Hsu  
Trial Date: N/A

**PLAINTIFFS' LIST OF DEFENDANTS' UNIDENTIFIED ASSETS**

Pursuant to the Court's Order dated 6/29/2024, Plaintiffs hereby identify the below list of the Original Jurisdictional Defendants' assets for which Plaintiffs have not yet received identifying information. Original Jurisdictional Defendants must

1 supply identifying information for these assets, including but not necessarily limited  
2 to: (1) any financial institutions custodial assets held by or for the benefit of the  
3 entities listed below; (2) the associated bank account numbers; (3) the peak value of  
4 each of the financial accounts since May of 2022; (4) the current value of the  
5 associated bank accounts; and (5) the name of the account holder. Please note that  
6 this list is intended to assist the Original Jurisdictional Defendants in identifying their  
7 assets, but pursuant to the Court's previous orders, they must also identify assets they  
8 control that are *not* included on this list and have not been previously identified.  
9

10  
11 **A. List For Max K. Day:**

- 12  
13 1. MKD Family Private Management Company — The list  
14 Defendants produced of account numbers that belong to this entity  
15 is not complete. Please provide a complete list of account numbers  
16 for accounts belonging to this entity.  
17  
18 2. Coinbase Account(s)  
19  
20 3. Ethereum Account(s)  
21  
22 4. Tradestation Account(s)  
23  
24 5. "Max Day" — Please identify all financial accounts held by the  
25 *business* named "Max Day" (see 2021 tax returns at, for example,  
26 JD 0041).  
27  
28 6. Lori Day — Please provide an accurate list of her financial  
accounts; Defendants provided the last four digits of her account

1 number at Priority Union Trust in their interrogatory responses,  
2 but those are not correct according to that credit union, and the  
3 Credit Union has not been able to locate her account(s)).  
4

5 **B. List for Max O. Day**

- 6 1. Personal Accounts — Max O. Day has failed to disclose all financial  
7 accounts held in his name or controlled by him. For example, he has  
8 failed to disclose his accounts held by Lili Financial Services and  
9 accounts linked to Lili Financial Services. Please disclose all  
10 accounts held by or otherwise controlled by Max O. Day.  
11  
12

13 **C. List for Michael Day**

- 14 1. WWKB accounts — the interrogatory responses disclosed one  
15 bank without an account number, but that is not a complete list of  
16 WWKB's bank accounts. Please identify all bank accounts held  
17 by WWKB since May of 2022.  
18  
19 2. DayCo Interest LLC — the interrogatory responses indicated one  
20 account held with "Ameritrade." Ameritrade was unable to locate  
21 any accounts held by DayCo Interest LLC. Please identify all bank  
22 accounts held by DayCo Interest LLC.  
23  
24 3. MVB Bank and Coinbase accounts — The account numbers for  
25 the accounts at MVB Bank and Coinbase.  
26  
27  
28

**D. List for Ryan Carroll**

1. Life Insurance Policy — Ryan Carroll’s interrogatory responses identify “Life Insurance Policy” as an asset. Please identify the institution holding the life insurance policy and the policy number.
2. “Carroll Private Management Company LLC” — Ryan Carroll has failed to disclose all bank accounts held by Carroll Private Management Company LLC. He has disclosed one account, but that disclosure is incomplete.
3. Dreams To Reality LLC — Ryan Carroll has failed to disclose all present and past accounts held by Dreams To Reality LLC. Please disclose all such accounts.
4. ENC Ventures — Ryan Carroll has failed to disclose any present or past account held by ENC Ventures. Please disclose all such accounts.
5. Start Scale Exit LLC — Ryan Carroll has failed to disclose all accounts held by Start Scale Exit LLC. Please disclose all such accounts.
6. Coinbase account(s) — Ryan Carroll has failed to disclose the account numbers for his Coinbase accounts. Please disclose all such accounts.

7. Apex Trade Funding accounts.

**E. List for Yax Ecommerce**

1. “Proficient Company” — This entity is disclosed as an asset on Yax Ecommerce’s tax returns. Please identify the assets.
2. Investment accounts — Yax Ecommerce’s tax returns indicate that its assets included \$2,568,010 of investments as of the end of 2022, but Yax Ecommerce did not disclose any investment accounts.
3. Bitcoin — Yax Ecommerce’s tax returns indicate that it made an investment in Bitcoin of \$144,972 in 2021 or 2022, and its later tax returns do not indicate any sales or transfers of that Bitcoin. Yet, Yax Ecommerce has not disclosed any cryptocurrency assets. Please disclose them.
4. Current Values — The interrogatory responses Yax Ecommerce produced are still missing the current values of the bank accounts. Please produce that information.

**F. List for Precision Trading Group**

1. BFSA — Precision Trading Group’s tax returns indicate that an entity called Business Financial Solutions Advisory (“BFSA”) had an ending capital account of \$896,015 as of the end of 2022. Yet, Max K. Day’s (the owner of BFSA) disclosures indicate that BFSA’s accounts had a peak value of only \$65,000.

- 1 2. Depreciable Assets — Precision Trading Group’s tax returns indicate that it  
2 has depreciable assets and a vehicle, and it has not disclosed those assets.
- 3 3. “Wealth Assistants” — Precision Trading Group’s tax returns indicate it has a  
4 current asset called “Wealth Assistants” with assets of \$72,709 as of the end of  
5 2022. Please identify that asset.
- 6 4. Dask LLC — PTG’s tax returns indicate it has an asset called “Dask LLC”  
7 with end-of-tax-year assets of \$1,000 as of 2022. Please identify that asset.
- 8 5. Max Pro Marketing — PTG’s tax returns indicate it has an asset called “Max  
9 Pro Marketing” with assets of \$66,400 as of the end of 2022. Please identify  
10 that asset.
- 11 6. HouTex Farm — PTG’s Tax returns indicate it has an asset called “HouTex  
12 Farm” with assets of \$184,327 as of the end of 2022. Please identify that asset.
- 13 7. Brokerage Investments — PTG’s tax returns indicate it had “brokerage  
14 investments” with assets of \$192,847 as of the end of 2022. Please identify that  
15 asset.
- 16
- 17
- 18
- 19
- 20
- 21

## 22 **G. List for WA Distribution**

- 23 1. Accounts Accepting Payments In The Name Of WA Distribution — WA  
24 Distribution has not provided a complete list of accounts over which it has  
25 control. There are bank accounts that are still accepting payments on behalf of  
26  
27  
28

1 WA Distribution, and Defendants have not disclosed those bank accounts.

2 Please disclose them.

3

4

5 Dated: July 1, 2024

6

/S/ Nico Banks

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